

UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

IN RE: VALSARTAN, LOSARTAN, AND
IRBESARTAN PRODUCTS LIABILITY
LITIGATION,

MDL NO. 2875

HON. ROBERT B. KUGLER

THIS DOCUMENT RELATES TO:

*Richard Ramirez v. Mylan Laboratories
Ltd., et al.*

Case No. 1:20-05595-RBK-JS

**DEFENDANTS' CROSS NOTICE OF VIDEOTAPED DEPOSITION OF
DR. MARWAN ISKANDARANI**

PLEASE TAKE NOTICE that, in accordance with Rule 30 of the Federal Rules of Civil Procedure and the Fact Witness Deposition Protocol in this case (Case Management Order #20, filed November 17, 2020 - Document 632), Defendant Mylan Pharmaceuticals Inc. will take the cross deposition upon oral examination of Dr. Marwan Iskandarani, on **November 4, 2021 at 9:30 a.m. EST**, and continuing until completion, via Zoom video conference.

Please take further notice that: the deposition will be conducted remotely, using audiovisual conference technology; the court reporter will report the deposition from a location separate from the witness; counsel for the parties will be participating from various, separate locations; the court reporter will administer the oath to the witness remotely; and the witness will be required to provide government-issued identification satisfactory to the court reporter, and this identification must be legible on camera. The deposition shall be videotaped and recorded stenographically, and will continue from day to day until completed before a person duly authorization to administer oaths who is not counsel of records or interest in the events of this case. The court reporter and videographer will be an employee or agent of Worldwide Court Reporters, and they have provided that the remote deposition will take place at the following link:

<https://us02web.zoom.us/j/85983151402?pwd=NUF3S2Z5TFg0N2pSTXNyTzlwRVIDZz09>

Additionally, in accordance with paragraph B (1) of C.M.O 20 (Dkt. 632), notice is hereby given that the undersigned will be the lead questioning attorney during the cross deposition. The attorney contact for the cross deposition is:

Frank H. Stoy
Pietragallo Gordon Alfano Bosick & Raspanti, LLP
One Oxford Centre, 38th Floor
Pittsburgh, PA 15219
(412) 263-4397
fhs@pietragallo.com

Date: November 3, 2021

Respectfully submitted,

s/ Clem C. Trischler
Clem C. Trischler, Esq.
Jason M. Reefer, Esq.
Frank H. Stoy, Esq.
Pietragallo Gordon Alfano Bosick & Raspanti,
LLP
One Oxford Centre, 38th Floor
Pittsburgh, PA 15219
(412) 263-2000 Telephone
(412) 263-2001 Facsimile
cct@pietragallo.com
jmr@pietragallo.com
fhs@pietragallo.com

*Attorneys for Defendants Mylan
Pharmaceuticals Inc., Mylan Laboratories
Ltd., Mylan Inc., and Mylan N.V.*

CERTIFICATE OF SERVICE

I hereby certify that on November 3, 2021, I electronically filed the foregoing document with the Clerk of the court using CM/ECF system which will send notification of such filing to the CM/ECF participants registered to receive service in this MDL.

s/ Clem C. Trischler

Clem C. Trischler, Esq.
Pietragallo Gordon Alfano Bosick & Raspanti,
LLP
One Oxford Centre, 38th Floor
Pittsburgh, PA 15219
(412) 263-1816

*Attorney for Defendants Mylan
Pharmaceuticals Inc., Mylan Laboratories
Ltd., Mylan Inc., and Mylan N.V.*